



Department
for Business
Innovation & Skills

SMALL BUSINESS COMMISSIONER

Summary of responses

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Introduction

1. The Government is working to make the UK the best place to grow and start a business. The performance and activity of small businesses is vital to the UK's economic growth. Small businesses (those with fewer than 50 employees) are responsible for 48% of UK private sector employment – employing 12.1 million in 2014. And they are responsible for around a third of private sector turnover – with combined annual turnover of £1.2 trillion.
2. Small businesses are not always sure where to turn to help them sort out disputes with other businesses. There are existing dispute resolution bodies which provide valuable services. But for general contractual issues, including where smaller businesses feel that other businesses treat them unfairly, the Government is concerned that not enough small businesses are able to settle their problems with larger corporations sufficiently quickly and inexpensively while maintaining their business relationships.
3. The Government is aware that some small firms suffer because of an imbalance in bargaining power when dealing with larger businesses. They may feel unable to challenge contract terms proposed by larger businesses for fear of damaging their commercial relationship. They may not have the time, money or expertise to make a legal challenge where they believe practices are against the law. These issues can put them under additional pressure, limiting their opportunity for growth, and in some circumstances, putting their business at risk.
4. The Government launched a discussion paper on proposals to establish a Small Business Commissioner on 26th July 2015. The consultation was open for 4 weeks and closed on 21st August. The discussion paper sought views on the Government's current understanding of the problems that small businesses face and our thinking about possible solutions.
5. The Government's proposed approach was to establish a service to complement existing provision and lead a culture change in how businesses resolve – and ultimately avoid – commercial disputes. A number of international models had been used to inform our thinking about how to create an effective solution for businesses here, including the Victorian Small Business Commissioner (VSBC) in Australia.
6. We proposed that the new Small Business Commissioner would handle disputes – including about late payment – between small businesses and larger businesses with which they have a contractual relationship. These disputes may relate to pre-contractual negotiations as well as terms of the contract and new arrangements proposed once a contract is in place; for instance, if a firm feels it is being harmed by the other party's unfair behaviour.
7. The discussion paper outlined three potential functions for the Small Business Commissioner:
 - **Providing information, general advice and signposting**
This would usually be the first point of contact for small businesses. They would be offered information and general advice on how to avoid contractual situations that leave them powerless to protect their interests. Then, if things do go wrong, they could find out about ways to resolve disputes themselves, where possible. If needed, the small business would be signposted to a relevant external dispute

resolution service (e.g. an Ombudsman) or may be offered mediation or the Commissioner's own complaint handling service.

- **Resolving disputes through mediation**

If the two sides couldn't agree on a contractual issue, the Commissioner could offer a voluntary mediation process to help small businesses sort out issues quickly and affordably without having to take legal action.

- **Dealing with complaints**

The discussion paper proposed that the Commissioner would be able to look into complaints and declare its findings. This would prove particularly useful where one of the parties were unwilling to take part in voluntary mediation or if a small firm alleged that unfair business practices were causing it harm but the issues complained of are lawful (for example they are allowed by the contract). An independent view may well help to resolve the problem.

Responses received

8. We received 97 written responses to the discussion paper. Thirty-five were from business representative bodies, trade organisations and professional bodies covering a range of sectors including mediation practitioners, legal, and finance and accountancy professionals. We also had 28 responses from small and large businesses. The remaining responses were from individuals. A list of organisations and businesses is available in Annex 1.
9. In addition to the formal consultation, BIS conducted five roundtable events with a range of stakeholders including small and large businesses, business representative organisations and existing public and private sector providers (Ombudsmen, mediators etc.).

Summary of responses

The problems faced by small businesses

10. Chapter 6 of the discussion paper set out the Government's understanding of the problems that small businesses can face when contracting with larger firms. The discussion paper included a number of specific questions, highlighting the particular issues on which the Government sought comment and evidence. This chapter summarises the views put forward in response to the questions 1-11.
11. The consultation sought evidence on unfair or unfavourable treatment of small businesses in contract negotiations (including for variations of terms) and asked specifically about the circumstances that can make certain practices unfair.
12. Over half of respondents cited some evidence of unfavourable treatment by larger companies. The majority of these responses provided evidence of late payment and many also provided evidence on wider payment issues. Several respondents specifically highlighted the use of extended payment terms as being particularly problematic. The roundtable discussions echoed this focus on late payment and other payment terms as some of the key issues small businesses face in their contractual dealings with larger firms.
13. One trade body had conducted research which showed that approximately 15% of their members who work on corporate insolvency cases said that late payments by customers for goods and services had been a primary or major factor in between 26% and 50% of corporate insolvency cases over the last 12 months (Jan 2013 – Jan 2014). Nine per cent said it was a primary or major factor in 51% or more of the corporate insolvency cases in the last 12 months.
14. One small business representative organisation had undertaken research with members and non-members to gauge the issues small businesses experience when contracting with larger firms. The responses indicate that small businesses are more likely to experience poor business practices when they are the supplier (41% of non-members; 51% of members experienced poor practices) compared with when they are the customer (16% of non-members; 18% of members). The main problems for these small business suppliers cited were:
 - Exceeding late payment terms (33% of non-members; 41% of members)
 - Long payment terms (27% of non-members; 19% of members)
 - Bad debts (11% of non-members; 13% of members)
 - Discounts for prompt payment (9% of non-members)
 - Supplier assessment fees (5% of non-members)
15. The roundtable discussions also raised issues around small businesses being unfairly challenged on the quality of the work in relation to larger companies refusing to pay agreed amounts.

16. A number of respondents to the discussion paper specifically cited Government contractors' behaviour as particularly poor. These examples largely centred on late payments and problems caused by the monopoly of purchasing power in public sector supply chains.
17. Many respondents emphasised the serious consequences that poor payment practices can have for smaller businesses including the cost to business of working to collect late payment and the cash flow difficulties it creates. Several respondents to the discussion paper highlighted that although small businesses can also be the culprits of poor practice, they are likely to suffer disproportionately from larger firms in terms of their treatment. The research conducted by one small business representative organisation showed that 31% of the small businesses surveyed provided services to large companies. Of this figures 21% had had issues with these companies compared to 10% who had no problems.
18. Respondents provided a number of circumstances that can make these practices unfair to small businesses. The common ones were:
 - Lack of time and resource to challenge
 - Disparity / imbalance of negotiating / bargaining power
 - Lack of knowledge and awareness of support / redress
 - Being afraid of the consequences / damaging commercial relationships
 - Position in the supply chain
19. A small number of respondents stated that they did not have any evidence of unfair or unfavourable treatment of small businesses. Of those responses, two provided evidence of positive treatment by larger businesses. One large business provided details of their best practice techniques and the ways in which they actively promote the fair treatment of suppliers. The other response, from a small supplier, highlighted the particularly good practice of a large customer in always paying on time and never disputing or discounting the amount owed.
20. We were also interested to know whether small businesses had, within the last two years, tried to challenge proposed contract terms or arrangements, or had refused to enter a contract because they felt terms were unfavourable or unfair.
21. Some respondents stated that they (or their members) had tried to challenge proposed contract terms or arrangements, but there was a general consensus that small businesses generally do not feel able to challenge. The reluctance of small businesses to challenge larger firms was largely attributed to concerns over the potential for repercussions, a lack of legal expertise and knowledge, and the time and resource required to take forward a challenge, all with no guarantee of success. A small number of respondents stated that they had refused to enter a contract with a large firm because of a dispute over proposed terms. Over half of respondents did not answer the question.
22. The consultation specifically sought evidence on payment practices as listed in the table below, and asked whether respondents had encountered other unfavourable or unfair payment practices. It asked respondents about their experiences (if any) of these

practices, whether they have concerns about any of the practices listed, and whether there are circumstances in which the practices are particularly problematic for the day-to-day running of their business. The consultation also asked whether there were any circumstance in which these practices were acceptable.

Extended payment terms	Use of excessively long payment terms – whether proposed in the initial contract or by contract variation.
Prompt Payment discounts	Discounts businesses request for paying early or on time. For example, a firm that has agreed to pay 60 days following receipt of an invoice may also ask for an automatic discount of 3% if they pay on or before the 60th day.
“Pay to Stay” clauses	Flat charges which businesses levy on suppliers either as a requirement to be on a supplier list, or packaged as an investment into future business opportunities. It is often indicated that non-payment will result in de-listing.
Retrospective discounting	Some firms seek to apply retrospective discounts or ‘balance sheet bonuses’ to outstanding money owed to a supplier. This involves changes to the terms of the contract with the supplier after a contract has been agreed.
Stocking & listing fees	A cash fee paid up-front by a supplier to guarantee shelf space for a new line. Alternatively, businesses may require suppliers to pay listing fees to cover the cost of the administration of introducing new product lines.
Marketing contributions	Payments by suppliers towards the cost of advertising certain products and/or to cover the cost of price promotions.
Damage/waste payments	Payments requested from suppliers to cover problems ranging from poor stacking of pallets to putting bar code stickers in the wrong place. The payments may include lost profits, the cost of rectifying the problem and an administrative charge.

23. Many respondents expressed concerns about the practices listed in the table above, and stated that these practices can have an impact on the day-to-day running of their businesses (or their members’ businesses). Around one in ten respondents did not have concerns about the practices listed.
24. Around a third of respondents had either experienced (or their members had experienced) the practices listed in the table above. A small minority said they had not experienced any of these practices, most did not answer. Several respondents highlighted ‘pay when paid’ and retentions as being problematic for small businesses.

One representative organisation said that retentions were particularly problematic where they are applied outside the construction industry or in excess.

25. A couple of responses expressed some concern about the complexity of some payment practices and that the reason for late payment was often due to excessively bureaucratic payment systems or overly complex terms and conditions.
26. One small business representative organisation stated that poor contractual practices such as retrospective changes to payment terms and breaches of contract such as late payment reduce the economic and financial resilience of small businesses. For their members the persistence and the detrimental impact of unfavourable payment practices is a serious concern.
27. However, some respondents also expressed the need for caution if these practices were within the Commissioner's remit, to avoid an inadvertent major legal overhaul with some of the practices identified underlying freedom of contract rights which underpin commercial common law. For example, extended payment terms require each party to freely enter into a contract or agree to vary an existing contract that provides for extended payment.
28. There were mixed views about whether there are circumstances in which the practices listed in the table above are acceptable. An equal number of respondent thought that these practices were unacceptable as those who thought that there were some circumstances in which they can benefit suppliers. One small business representative organisation provided example of circumstance in which certain practices may be beneficial to suppliers, including:
 - Prompt payment discounts may be cheaper than bridging finance for some businesses but in other cases it can cause a business to become unviable
 - There are occasions where businesses may be prepared to pay a small administrative fee for e-invoicing if it saves them time and money or if they get paid more predictably.
 - Trade marketing costs such as costs for getting preferential placement or subsidising discount offers are sometimes beneficial for new brands or those that are looking to increase their market share.
29. Rather than the particular practice being unfair per se, it was the process that often made the arrangements unfair. It was suggested that in many cases it should be the supplier who suggests it to the customer and not the other way round.
30. The discussion paper also asked what more could be done to encourage more businesses to claim interest and late payment charges where appropriate and create an environment in which this is considered the norm.
31. Those responding to the consultation put forward some interesting suggestions, although there was general scepticism about any further intervention having the desired effect. A number of respondents thought that it would require a change in the culture of the broader business community.
32. A third of respondents responded with some suggestions including:
 - Improving the information available about payment processes and contracting
 - Fines through the tax system on companies that pay late
 - Wider use of project bank accounts
 - Automatic payment of interest

33. Respondents were asked how the new Commissioner could be helpful in resolving late payment disputes. Around two thirds thought that the Commissioner could be helpful, with many of those responding highlighting that the signposting role would be particularly useful. At the stakeholder roundtable discussions it was made clear that the Commissioner would need to work alongside other measures that are in place or that are due to come into force for example, the prompt payment reporting requirement.
34. A number of respondents also thought that the use of mediation would prove to be useful in resolving late payment disputes. A similar number of respondents expressed support for the proposed complaint's handling function and the "naming and shaming" of poor paying companies. Many thought that naming would ensure the Commissioner had sufficient visibility and power.
35. However there was concern from some about how the naming and shaming would work, and also that the Commissioner would be overwhelmed with complaints. There were conflicting views about whether the SBC should be able to award financial compensation – with some respondents suggesting that this would give the SBC greater clout while others opposed the idea.
36. The Government also sought views to inform whether the Commissioner's remit should cover disputes about general contractual issues within a supply chain relationship. Business to business disputes can arise on a range of contractual issues. Small firms may find themselves in dispute over supply chain issues regarding the interpretation of contract terms, logistics, sale of goods, dealing arrangements, and other claims involving the delivery of goods or the quality of a service.
37. The consultation asked whether small businesses had taken any action to resolve disputes about these wider supply chain issues, and what was the outcome. If no action had been taken, it asked what had deterred them from taking action. Finally, respondents were asked how the new Commissioner could be helpful in resolving those disputes.
38. Over two thirds of respondents did not answer this question. Of those who did respond, the largest proportion stated that they had not taken action to resolve disputes about wider supply chain issues. A further number of respondents stated that they had taken action, but very few expanded to explain what the circumstances were and what the outcome was.
39. Over half of respondents did not provide suggestions about how the Commissioner could be helpful in resolving wider supply chain disputes. There was a mix of views from those who did respond with some respondents stating that the proposals on mediation and naming [and shaming] could help. The remaining respondents were unsure that the Commissioner would really be able to add value in this space.
40. Several respondents expressed concern that the Commissioner was trying to do too much and needed to have a focused mandate, addressing a small number of pertinent issues. This was echoed in the stakeholder roundtable discussions with respondents agreeing that the Commissioner should go for some early successes on specific areas, and not try to do everything at once. This would allow the Commissioner to build a good reputation.

41. A number of respondents clearly stated that the Commissioner should not have responsibility for wider supply chain issues.

Proposed functions

This chapter covers questions 12-20 from the discussion paper.

General Advice and Information

42. There was strong support for this proposed function for the Commissioner from stakeholders across the spectrum. In particular this stemmed from a belief that smaller firms can often be unaware of where to access advice. Many respondents also felt that this service could fill gaps in current provision. A few respondents highlighted that this was an important measure in addressing the imbalances of negotiating power between small and larger businesses and would support small businesses in preventing disputes from arising. Several stakeholders signalled the need for the Commissioner to offer a one stop shop for advice on good practice in contracting and alternative dispute resolution.
43. One gap that was highlighted by numerous responses was the need for general advice related to supply chain disputes, including the provision of good practice material to help small businesses in their ability to avoid disputes through better contract negotiation. A further advice and information need that was highlighted was the poor small business awareness of the process of mediation, how to access it, the time it can take and the cost. This concern was even expressed by some of the small number of respondents who didn't think there were significant barriers to accessing mediation.
44. While there was general support for a general advice and information function, there was a consistent and widely held view that the Commissioner should work with and complement the existing advice and information that is available for small businesses. A number of examples of sources of advice were given such as Growth Hubs, Ombudsman offices and the many services available from trade bodies. Several respondents emphasised the need for an easily navigated signposting capability for this function including to sources of more specialist advice. A number of respondents suggested that the Commissioner could be a catalyst for improving access to existing provision of good practice advice for small businesses, for example on strategies for managing payment issues.
45. There was a mix of views on the question of confidentiality in advice and information provision. Many thought it important given that the small businesses seeking advice and information would want to keep their options open in considering what to do about a dispute in light of any advice and information they receive. However there was some concern that providing advice on a confidential basis may later compromise the Commissioner's ability to decide a complaint if one is made to them by the same business in relation to the same issue because they would no longer be seen as neutral. This was based on an assumption that the Commissioner might give confidential detailed case-based rather than general advice.
46. The roundtable discussions echoed the support for the advice and guidance function. They emphasised a key issue as being the need to assist small businesses to better understand their rights so they are able to negotiate better deals.

Mediation

47. Views were mixed as to whether respondents or their members would consider using a mediation service to support them in settling a dispute with another business. Some business representative bodies were very supportive, often citing mediation as a cost effective and quicker alternative to going to court, whereas almost half of respondents said they wouldn't use or promote mediation.
48. Some of the concerns about mediation stemmed from a view that mediation itself can be costly and time consuming and in some cases can be used as a delaying tactic by those businesses wishing to avoid paying on time.
49. Many other respondents indicated that the limitations of mediation can stem from a fear of challenging larger companies on the part of some small businesses particularly given a perception that larger firms will not want to participate in mediation. This extended to concerns that seeking to resolve a dispute through mediation or other means may make a small business vulnerable to a risk of jeopardising their commercial relationships with the possibility of a loss in business.
50. Almost 50% of respondents supported the proposal that the Small Business Commissioner should offer mediation. In particular there was support for the notion that the Commissioner should concentrate on filling gaps in the market, where mediation through sector schemes is not available across all sectors. Many of those in favour of a role for the Commissioner felt it should be outsourced to the private sector and then in many cases they suggested it should be offered at a fixed and low-cost rate to ensure it is affordable for small businesses.
51. Although there were numerous references to gaps there was little or no evidence provided as to what and where those gaps were or indeed why it might be necessary to subsidise the provision of mediation. In fact there was a strong and widely supported view that there already exists a diverse range of existing providers of dispute resolution and redress schemes and that duplication by the Commissioner of existing provision should be avoided. In particular there was consensus that the Commissioner should not duplicate the work of ombudsman type schemes, such as the Financial Ombudsman Service; adjudicator schemes such as the Groceries Code Adjudicator; and the Small Claims Mediation Service. Nor should it duplicate the many sector specific industry dispute resolution schemes services available, for example, via membership and professional bodies. Instead a significant number of stakeholders recommended that the Commissioner signpost or refer to the dispute resolution services in place both those offering mediation or conciliation type approaches as well as those offering adjudication, arbitration and complaint handling.
52. Several respondents questioned whether there was evidence that the Commissioner would need to make direct provision, even some who were advocates for the importance of mediation, and there were a number of technical questions raised regarding a the possibility that the Commissioner would have a role in mediation. A few respondents questioned whether a Commissioner-delivered mediation service would be any better than that already available and a few questioned whether a mediation service delivered by the Commissioner would be able to develop the specialist knowledge to mediate the issues involved in some disputes. Others questioned whether it would be able to provide the geographical coverage that would

be required given that location of services seems to be an important issue in take up of mediation.

53. A number of other responses, while not signalling specific capacity issues in the market, suggested that the SBC might have a role in working with industry bodies to ensure consistently high standards in mediation provision. For their part industry representatives suggested that existing professional standards arrangements could provide this assurance.
54. There was general support for the idea that businesses should be encouraged to participate in mediation but a split of views as to how this should be achieved.
55. A number of respondents were doubtful that larger businesses would participate in mediation in order to resolve payment related issues as many would calculate it is not in their interests. Therefore there was significant support for the provision of strong incentives such as the option of the Commissioner providing certificates in relation to a failure to participate in mediation. Some felt that the provision of certificates would be helpful for small businesses if cases resulted in legal disputes.
56. Conversely, others were pleased that the Government signalled that it did not propose to compel businesses to participate in mediation and questioned the added value of certificates for failure to participate. There was considerable support for the idea that the Commissioner might achieve more in influencing positive behaviours in businesses through highlighting positive practice in terms of larger business engagement with mediation rather than through the issuing of certificates. In addition others argued that the provisions of certificates could be complicated given that unreasonable refusal or failure to participate in mediation could be a contentious issue to determine.

Handling Complaints

57. A third of respondents addressed the question of whether the Commissioner should have a complaints handling function and of these there was widespread support for the proposal that the SBC would look into individual complaints from small businesses. It was felt particularly important for cases where the larger business does not wish to participate in mediation.
58. The main benefit cited for this function was the ability of the Commissioner to publish specific findings. Many respondents argued that this level of transparency, including the 'naming and shaming' that this could involve, could be effective as a means of bringing about culture change in payment practices in individual cases and more broadly. Some stakeholders, were much more cautious on this issue particularly if the small business party to a complaint were identified. They were concerned that there may be repercussions for the small business in terms of its ability to secure future contracts.
59. A number of stakeholders suggested that the impact of publishing findings could be achieved through positive influence e.g. if it included scenarios where a dispute had been resolved. This was similar in spirit to suggestions by some respondents that the Commissioner should publicise good practice and/or might work with industry to endorse a 'kite-mark' type scheme.

60. There was stronger support, from a large majority of those who responded, for the proposal that the Commissioner produce annual reports. One potential benefit would be that annual reports would enable greater scrutiny by external stakeholders of the issues that the Commissioner comes across and his or her effectiveness in dealing with them e.g. in terms of the number and nature of resolved complaints. A number also cited the annual report as a key influencing mechanism in delivering the desired culture change in part because larger firms would fear any implied negative publicity where the report included data on the nature of issues put to the Commissioner.
61. A small number of respondents, around 5%, were against the complaints-handling function. Some questioned whether it was right for the Commissioner to be the arbiter of good business practice if the tests were focused on unfairness and not grounded in what was lawful or unlawful. A few stakeholders also challenged the proposal that findings would be published with one questioning whether it is fair for a business to be named when the complainant could remain anonymous arguing that it ran contrary to natural justice.
62. There was strong support for the proposals that the SBC should have the right to refuse complaints it does not deem suitable and where relevant signpost the complaint to other services that can help the small business resolve the dispute.
63. A few respondents were concerned that the proposals did not give the Commissioner enough powers to achieve its objective. For example some argued that the Commissioner should have the power to make binding decisions, stronger powers to require large business co-operation and the power to award penalties if large businesses ignore their findings. Some said that the Commissioner may not be able to achieve its aims because larger businesses would ignore its decisions.
64. There were concerns raised about confidentiality for the small businesses bringing complaints to the Commissioner. A number of stakeholders felt that the ability of the complainant to remain anonymous would be important both as a protection for the small business and to encourage take up. A few responses raised concerns akin to those related to mediation i.e. that a small business bringing a complaint is unlikely to get further business from the larger company and if the fact they had complained was communicated more widely it may make it more difficult to get new business as they could be perceived as a 'complainer'. Other stakeholders questioned whether anonymity could in practice be maintained in terms of the complaints service given that the circumstances may identify the small business.
65. Of the few respondents that addressed the specific question concerning the factors that might be taken into account to determine what is fair and reasonable in deciding complaints there was support for the type of factors that were suggested in the discussion paper. Some of the factors mentioned in responses included:
- Usual custom and practice in the industry,
 - Relative size of the two parties,
 - Whether there were unforeseen circumstances that caused problems for the supply relationship,
 - Steps each party had taken to resolve the dispute before going to the SBC,
 - The impact of the dispute on both businesses,

- Previous behaviours of both parties,
 - Industry good practice,
 - EU Late Payment directives and Late Payment legislation.
66. As well as comments on the Government's proposals, other roles were suggested for the Commissioner. Most common was the suggestion the Commissioner might have a role to co-ordinate and strengthen the impact of a range of initiatives to address late payment issues some considered the Commissioner should have a role in the enforcement of the Prompt Payment Code and some suggested the Commissioner might review how effective these initiatives were and if necessary make recommendations to Government for improvements.
67. There was a broad consensus, amongst those in favour, that the Small Business Commissioner must be adequately resourced in order to offer a credible and effective service to the business community. Amongst other things this was to ensure that complaint cases could be dealt with swiftly which would be important where the small business itself is in financial difficulty. At the same time a number of responses also recognised that there would be a need to prioritise resources particularly in terms of the extent of the advice and information function.
68. Related to the credibility point was a very strong view from across stakeholders that the Small Business Commissioner will need to be very effectively marketed to stimulate a high level of awareness amongst small and large businesses of its role. It was argued that small businesses do not have much time to source the right advice, information and even access to dispute resolution so promoting the Commissioner would be key. A few respondents suggested the Commissioner could also promote its services through private sector providers.

Next steps

The Government has considered the views expressed in response to the discussion paper, along with further evidence and consideration of other factors including cost implications. These have informed our final proposals in the Enterprise Bill which was introduced into Parliament on 16 September 2015.

Annex 1: List of respondents

31 Bit Systems Ltd
Absolute K.Ltd
ACCA
Ambition Partner
Amelia Rope Chocolate Ltd
Ardent Management Limited
Asset Based Finance Association
Association Convenience Stores
Association of British Insurers
Association of Independent Professionals and the Self Employed
Association of Labour Providers
autodotbiography Ltd
BBA
Bikal
Blue Autumn Limited
Bluerad No1 LLP
British Chamber of Commerce
British Coatings Federation
British Healthcare trades association
British Independent Retailers Association
British Library
British Retail Consortium
Building & Engineering Contractors' Association
Care England
Chartered Association of Business Schools
Chartered Institute of Arbitrators
Chartered Institute of Credit Management
Chartered Institute of Procurement and Supply
Cheriton Financials
Civil Justice Council
Civil Mediation Council
Competition and Markets Authority
Confederation of British Industry
Contrado Digital Ltd
Country Land and Business Association
DWP
East Midlands Chamber
Excel Communications (HRD) Ltd
Experian
Federation of Small Business
Feed Me Bottles Ltd
Financial Ombudsman Service

Food and Drink Federation
Forum Of Private Business
Freelancer and Contractor Services Association
Gabriel Information Solutions Ltd
GK Strategy
Graham Bridgeman
ICAEW
Institute of Directors
The Institution of Engineering and Technology
International Association for Contract and Commercial Management
John Lewis Partnership
Kinzere Ltd
Law Society
Link Legal Solutions Ltd
Ministry of Defence
National Federation of Roofing Contractors
National Specialist Contractors Council
Ohyo Ltd
Oxygen Finance Ltd
Prederi Limited
ProMediate (UK) Limited
Red Parrot Publishing (New Business magazine)
Royal Town Planning Institute
Skyscape Cloud Services Ltd
Specialist Engineering Contractors Group (SEC)
Taylor Roe Ltd
The Care Partnership (UK) Limited
The Swimming Pool and Allied Trades Association



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